

## Health & Safety: Accidents, Incidents and Near Miss 2025/26

### Final Internal Audit Report



Date of issue: September 2025

Audit reference: 03.25/26

## Table of Contents

Executive summary	3
Annex 1: Management Actions	9
Annex 2: Objective, scope, and distribution	18
Annex 3: Our classification systems	19

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# Executive summary

## Introduction

The review is part of the agreed internal audit plan for 2025/26.

Under the Health and Safety Act 1974, it is the duty of every employer to ensure, as far as is reasonably practicable, the health, safety, and welfare at work of all its employees. Accidents, incidents and near misses are covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2015.

An accident is any unplanned and uncontrolled event that has the potential to result in injuries to people, damage to property or any other loss. A near miss is any accident that does not result in injuries to people, damage to property or any other loss but which had the potential to have done so if circumstances had been slightly different.

Dangerous occurrences are certain incidents with a high potential to cause death or serious injury. Those incidents which are classified as dangerous occurrences, and which must be reported, are listed in Schedule 2 of

## Objective

- The objectives of this review are to assess whether Slough Borough Council has in place adequate and appropriate policies, procedures, and controls in relation to accidents, incidents and near miss reporting with a view to providing an opinion on the extent to which risks in this area are managed. This includes recording of incidents, investigation of the circumstances to understand the root causes, and the efficacy of actions / control measures implemented to prevent recurrence.

## Key Findings

The following are the key findings from the audit:

- **Health & Safety Policy and Procedures in place:** Council's Health & Safety Policy has not been subject to a regular review with the last record date as October 2023.
- **Health & Safety Board Meetings:** The Council's Health & Safety Policy requires such forums to be held bi-monthly, however it is noted although the most recent meeting was held on the 17 June 2025 the previous one was eight months ago. It is noted that Health & Safety Management have advised these meetings have now been re-scheduled to be held on a bi-monthly basis.
- **Induction for new starters:** Health & Safety does not form part of the induction day informing staff of their responsibilities.
- **Accident and Investigation in-house training course** has not been held since September 2024.

- **Risk assessment reviews** post-accident are not always being undertaken.
- **Incident Investigation Aide Memoire Forms** are not being completed.
- **Insurance claims data** is not recorded within accident statistics. We have been advised by the Health & Safety Manager that a new reporting process has been agreed with the current Risk Manager.
- **Unable to verify that Health & Safety is discussed at Directorate levels** for all Directorates.

## Conclusion and Opinion

Based on the control weaknesses identified an audit opinion of Partial assurance in that there are significant weaknesses in the framework of governance, risk management and control such that it could be or could become inadequate and ineffective

# Detailed Findings

Detailed findings in respect of the identified risks are set out below.

## **Risk 1: Roles and Responsibilities**

The Council's Corporate Health & Safety Strategy 2023-2026 and Health & Safety Corporate Policy sets out the following roles and responsibilities in respect of accidents and incidents:

All staff members/internal stakeholders to report any accidents, incidents or near misses to their line manager so they can be investigated and prevented from re-occurring; and

Senior Managers Team Leaders to ensure investigations of accidents and incidents are conducted when required.

Audit testing of a sample of eight accident/incidents found one did not have an accident/incident form completed thus it was not forwarded to their Line Manager as per the procedure.

It was also found that in one case there were no details provided on action taken to implement recommendations raised in the report.

## **Risk 2: Policies and Procedures**

We reviewed the health and safety policy and supporting procedures to ensure they clearly set out Council roles and responsibilities, are regularly reviewed, have been approved by senior management and are effectively communicated to officers. Our review identified the following:

### SBC Health & Safety Policy

The policy sets out the responsibilities of Officers and Elected Members of Slough Borough Council. The policy was issued in October 2021 with a review date of October 2023. There is no evidence that the policy has been reviewed since its issue in 2021. Therefore, it is not clear if it still meets current Council procedures, legislation, or best practices. **(Management Recommendation 1: Priority: High).**

On searching SBCinsite for a Health & Safety Policy, the search provided a link that went to a Policy dated 2018. On the same page it has a link to show the level of training required but this goes to the Health & Safety Policy dated 2021. This will be very confusing for staff to clearly know what details are correct and could directed to incorrect information. **(Management Recommendation 1: Priority: Medium).**

## **Risk 3: Training**

Health & Safety is no longer part of the induction day for new starters, so staff are not being made aware of their own responsibilities and the Councils procedures. **(Management Recommendation 2: Priority: Medium).**

The Council's Health & Safety Policy states:

Managers who are required to conduct investigations into accidents etc. must attend the 'Accident Investigation' course. There is an accident and investigation training course that is run in-house but has not been run since September 2024. This would mean that there are

managers who have commenced employment with the Council who are unaware of their responsibilities or the procedures they should be following. **(Management Recommendation 3: Priority: Medium).**

#### **Risk 4: Financial Risks**

Where an accident claim is received from members of staff this is more likely to be received by the Insurance Team. The Insurance Team may contact Corporate Health & Safety for details of any risk-assessments for example. The incident is not recorded on Corporate Health & Safety records but is more likely to be held on the Insurance Team database. Cases need to be recorded on the Health & Safety Team's database to ensure full records are held in one place of accidents/incidents and the outcome including possible legal action. **(Management Recommendation 4 - Priority: Medium).**

#### **Risk 5: Reporting, Recording and Investigation**

The Council's Corporate Health & Safety Strategy 2023-2026 includes an objective that incident data is available to be able to identify trends and prevent reoccurrences.

##### Accident Reporting

For one of the sample of eight reported incidents the accident/incident reporting form had not been signed by the Line Manager and no details on what preventative actions were taken as a consequence of the accident/incident. **(Management Recommendation 5 - Priority: Low).**

##### Accident Investigation

All accidents and incidents will be investigated to establish whether additional procedures are needed to prevent the likelihood of recurrence. Risk assessments, Safe Operating Procedures, training, instruction, or levels of supervision may need to be reviewed following the investigation.

Of the sample of accident/incident forms one example was found where the matter was referred to the Corporate Health & Safety Advisor, but no details of the outcome was recorded. On a separate form, a recommendation was made to undertake further action, but no details provided as to whether this transpired. **(Management Recommendation 6 - Priority: Low).**

Form 001A: Accident Incident and Near Miss Report Form requires confirmation that a risk assessment review has been completed post-accident. A review of the sample of cases found that in seven cases, a form had not been completed. **(Management Recommendation 7 - Priority: High).**

An Incident Investigation Aide Memoire Form should be used as an aide memoire to assist managers complete an incident investigation. Once complete, managers should keep a copy, and a copy should be sent to the Corporate Health and Safety Team. Of the sample of eight accident/incident reports selected, all were found not to have a completed form. **(Management Recommendation - Priority 8: Medium).**

## **Risk 6: Management Reporting:**

The Council's Health & Safety Policy has set out the governance framework that manages Health & Safety responsibilities. Audit has provided an update:

### Corporate Consultative Forum

The Corporate Consultative Forum (CCF) is the principal point of consultation between elected members, managers, and trade union representatives. Its main duties in respect of accidents and incidents include:

- To receive reports on work-related accident & incident trends.
- To receive reports of any significant health & safety incident or issue which may have implications for the Council.

A review of current committees listed on SBC's website found no reference to the CCF and a review of the committee structure set out in the Council's constitution would indicate that the CCF no longer operates and the Health & Safety Policy document should reflect this. Health & Safety Manager confirmed that this committee does not currently exist and was not in place when he joined the Council. **(Management Recommendation 9 - Priority: Medium.)**

### Corporate Leadership Team

At monthly CLT meetings a Health & Safety update is provided supported by a report that sets out key areas and issues relating to accidents and incidents as well as violence, aggression, and abuse of staff.

### Health and Safety Board

The Health and Safety Board is responsible for driving improvements in the control of health and safety risks. Its main duties in respect of accidents and incidents include:

- Review the statistics on work-related accidents, incidents, and health & safety training. Identify trends and initiate more detailed analysis or corrective action to reduce risks.
- Examine reports on significant accidents and incidents. Give instructions to services to ensure that any lessons learnt that have a wider impact are implemented across the relevant services.

In accordance with the Council's Health & Safety Policy the Health & Safety Board meetings are to be held bi-monthly. Audit found that the most recent meeting was held in September 2024. Failure to hold frequent Health & Safety Board Meetings undermines the governance framework and the drive towards improvements in the control of Health & Safety risks. **(Management Recommendation 10: Priority: Medium).**

### Directorate Consultative Forums / Health and Safety Committees

Corporate Health & Safety Team advised Audit that they have started to attend some Directorate Leadership Team meetings such as Chief Executive Office, IT & HR and Adult

and Children Services to provide Health & Safety updates. They are looking to extend this to other Directorates.

We received confirmation, and evidence of minutes from meetings, from Corporate Resources Directorate and Social Care Directorate that Health & Safety is discussed at Directorate Management level. We did not receive a response from Property & Housing Directorate or Chief Executives directorates, so we are unable to confirm Health & Safety is discussed at this level. **(Management Recommendation 11: Priority: Medium).**

# Annex 1: Management Actions

Findings are exceptions-based and are designed to communicate key issues identified during the audit, together with suggested actions for improvement.

**Assessed Risk 2:** Policies and procedures not being adhered to leading to inappropriate health and safety measures within the workplace.

<u>Health &amp; Safety Policy</u>					
No	<u>Expectation</u>	<u>Finding</u>	<u>Implication</u>	<u>Recommendation</u>	Priority
1	Up to date Health & Safety policy in place.	<p>The policy sets out the responsibilities of Officers and Elected Members of Slough Borough Council. The policy was issued in October 2021 with a review date of October 2023. There is no evidence the document has been reviewed and if applicable updated to ensure it aligns with relevant legislation and best practices.</p> <p>Links on the Council website lead to an outdated version of the policy</p>	<p>The policy may not reflect current legislation and best practice leading the Council to be at risk of potential legal implications and criminal and financial penalties.</p> <p>Staff could be using incorrect information if using current links</p>	<p>A) Health &amp; Safety Policy to be reviewed and updated where necessary to reflect current legislation and best practice. Policy to be approved by the appropriate Council Committee.</p> <p>B) Health &amp; Safety Policy to be reviewed on a regular basis. This could be evidenced by having a version control sheet within the document.</p> <p>C) Once the Health &amp; Safety Policy has been approved there should be a Council wide communication of its existence and the importance for staff to be aware and follow its</p>	High

				requirements in their working day. D) Once the Health & Safety Policy has been approved it should be uploaded on to SBC Insite and links corrected to point to the document.	
Management Response		The Health and Safety Policy was updated in June 2025 and agreed at SBC CLT and Health and Safety Board. It is being uploaded to SBCInsite in August 2025. Reviews will take place Bi-Annually. Approved by CLT	Responsible Individual	Craig Hill, Health & Safety Manager	
			Date for Implementation	Implemented	

**Assessed Risk 3:** The Council does not provide health and safety training in respect of accident reporting procedures to enable staff to discharge their responsibilities.

<u>Staff Induction</u>					
No	Expectation	Finding	Implication	Recommendation	Priority
2	New starters informed of their Health & Safety responsibilities.	Health & Safety is no longer part of the induction day for new starters.	Failure to inform new starters on their responsibilities in reporting accidents, incidents and near miss.	Corporate Health & Safety Team consult with Learning & Development to look to arrange for a slot to be included on the induction day for new starters regarding Health & Safety issues.	Low
Management Response		Health and Safety is now a standard part of SBC Induction as of July 2025	Responsible Individual	Craig Hill, Health & Safety Manager	
			Date for Implementation	Implemented	

Accident Investigation' course.					
No	Expectation	Finding	Implication	Recommendation	Priority
3	Line Managers given sufficient training to enable them to perform effective accident investigation.	Managers who are required to conduct investigations into accidents etc must attend the 'Accident Investigation' course. There is an accident and investigation training course that is run in-house which comprise of two elements: first day is predominantly e-learning and second day is more face to face and practical. The course has not been run since September 2024.	Accidents and incidents not subject to effective investigation.	Accident Investigation course to be reviewed, and updated as required, and then re-activated. Line Managers contacted to remind them to enrol on the Course.	Medium
Management Response		Accident Investigation Training has undergone a revamp and will be delivered from October 2025		Responsible Individual	Craig Hill, Health & Safety Manager
				Date for Implementation	October 25

**Assessed Risk 4: Potential for fines, compensation claims, prosecution costs, and increased insurance premiums in the event of accidents and incidents.**

<u>Insurance claims</u>					
No	Expectation	Finding	Implication	Recommendation	Priority
4	Corporate Health & Safety data represents complete and accurate position of reported accidents.	Where members of staff make an accident claim this may come into the Insurance Dept via the claimant's solicitor on the assumption that the council is in breach of its statutory duty of care. The insurance team may contact Corporate Health & Safety for details of any	Management information on accidents/incidents incomplete.	A) Corporate Health & Safety Team to consult with Insurance Team to arrange for insurance claim data on accident claims to be incorporated the Health & Safety database.	Low

		risk-assessments for example. The incident is not recorded on Corporate Health & Safety records but more likely on the insurance team.		B) Content to be agreed, with Insurance Team for a joint report to the Health & Safety Board covering such claims details.	
Management Response	Monthly meetings between SBC Health and Safety and SBC Legal is now standard as of August 2025 as to work as a team to address any claims.		Responsible Individual	Craig Hill, Health & Safety Manager	
			Date for Implementation	Implemented	

**Assessed Risk 5: Ineffective process for reporting and recording accidents, incidents and near misses and such events are not investigated to prevent similar events from occurring in the future.**

<u>Submission of accident/incident form to Line Manager</u>					
<u>No</u>	<u>Expectation</u>	<u>Finding</u>	<u>Implication</u>	<u>Recommendation</u>	<u>Priority</u>
5	Accident/incident report forms to be subject to review by Line Manager.	One of the sample items was found not to have completed by the Line Manager.	Failure to document details on what preventative actions taken as a consequence of the accident/incident.	Remind staff of requirement to forward accident/incident report form to their Line Manager for completion.	Low
Management Response	A new, Microsoft based accident report form will have review/investigation requirements by the appointed manager as standard as of October 2025. All RIDDOR incidents are automatically investigated as standard practice.		Responsible Individual	Craig Hill, Health & Safety Manager	
			Date for Implementation	October 2025	

<u>Recorded outcome of investigation</u>					
<u>No</u>	<u>Expectation</u>	<u>Finding</u>	<u>Implication</u>	<u>Recommendation</u>	<u>Priority</u>
6	Sufficient detail provided on investigate action taken.	Of the sample of accident/incident forms an example found where the matter was referred to the Corporate Health & Safety Advisor, but no details were provided on the outcome. On a separate form, a recommendation was made to undertake further action, but no details provided as to whether this transpired.	Lack of audit trail demonstrating outcome of investigative action taken.	Staff reminded to ensure outcome of investigative action taken is recorded.	Low
Management Response		The new, Microsoft accident form will have an audit trail and evidence embedded within it from October 2025	Responsible Individual	Craig Hill, Health & Safety Manager	
			Date for Implementation	October 25	

<u>Risk Assessment Reviews</u>					
<u>No</u>	<u>Expectation</u>	<u>Finding</u>	<u>Implication</u>	<u>Recommendation</u>	<u>Priority</u>
7	Form 001A: Accident Incident and Near Miss Report Form requires confirmation that a risk assessment review has been completed post-accident.	A review of the sample of items found that in seven cases the form was not annotated to show whether a risk assessment had been reviewed post-accident.	Failure to ensure risk assessment reflects outcome of accident investigation.	Health & Safety Team to contact managers where the outcome of a review of the risk assessment post-accident is not recorded to complete the task. If persistent offenders are noted these individuals should be made to take the Health & Safety training course as a refresher.	High
Management Response		The new Microsoft accident form will have an automated request and evidence for risk assessment review embedded within it.	Responsible Individual	Craig Hill, Health & Safety Manager	

	New process will embed that the outcome must be completed before moving on to conclude the report.	Date for Implementation	October 2025
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Incident Investigation Aide Memoire Form

No	Expectation	Finding	Implication	Recommendation	Priority
8	An Incident Investigation Aide Memoire Form should be used to assist managers complete an incident investigation. Once complete, managers should keep a copy, and a copy should be sent to the Corporate Health and Safety Team.	Of the sample of eight accident/incident reports selected, none were found not to have a completed incident investigation aide memoire form.	Investigation not conducted thoroughly.	Health & Safety Team to contact managers where the incident aide memoire has not been completed appropriately. If persistent offenders are noted these individuals should be made to take the Health & Safety training course as a refresher.	Medium
Management Response		This will form part of the new, standardised accident reporting process as of October 2025 New process will embed that the aide memoire must be completed before moving on to conclude the report.	Responsible Individual	Craig Hill, Health & Safety Manager	
			Date for Implementation	October 2025	

**Assessed Risk 6: Poor governance arrangements in place for reviewing, scrutinising, and managing health and safety accidents, incidents and near miss.**

Corporate Consultative Forun (CCF)

No	Expectation	Finding	Implication	Recommendation	Priority
9	The Corporate Consultative Forum (CCF) held regularly to execute its role as being principal point of consultation between elected	A review of current committees listed on SBC's website found no reference to the CCF and a review of the committee structure set out in the Council's constitution would indicate that the	Lack of effective consultation between elected members,	A) Health & Safety Policy to be updated to reflect the forums that are in place to manage Health & Safety responsibilities.	Medium

	members, managers, and trade union representatives.	CCF no longer operates and the Health & Safety Policy document should reflect this. Health & Safety Manager confirmed there is currently no CCF in place.	manages and trade union representatives.	B) To establish how Health & Safety should be reported to Members and trade unions representatives to ensure they are aware of any issues the Council may be facing. Health & Safety to be updated to reflect current practice.	
Management Response		H&S Policy has been updated (see Action 1). The Corporate Consultative Forum (CCF) was a HR run meeting, and they decided to stop these when H&S moved directorates. H&S is reported at the H&S Board, and a copy of the minutes are sent to the Trade Unions representatives, and CLT. HR have reached out to the Trade Unions with an invite to attend H&S Board meetings and are awaiting a response.		Responsible Individual	Craig Hill, Health & Safety Manager
				Date for Implementation	Implemented.

Health & Safety Board Meetings

<u>No</u>	<u>Expectation</u>	<u>Finding</u>	<u>Implication</u>	<u>Recommendation</u>	<u>Priority</u>
10	Health & Safety Board held frequently and attended by representatives from all Directorates.	In accordance with the Council's Health & Safety Policy the Health & Safety Board meetings are to be held bi-monthly.  Audit found that the most recent meeting was held in September 2024.	Failure to held frequent Health & Safety Board Meetings undermines the governance framework and the drive towards improvements in the control of Health & Safety risks.	Frequency of Health & Safety Board meetings to be held in accordance with the Health & Safety Policy.	Medium
Management Response		Health and Safety Board meetings are now held bi-monthly. Meetings in 2025 have been held in April, June, August and are also planned for October and December		Responsible Individual	Craig Hill, Health & Safety Manager
				Date for Implementation	Implemented.

Health & Safety – Directorate level meetings					
No	Expectation	Finding	Implication	Recommendation	Priority
11	Health & Safety matters are discussed at directorate management level on a regular basis.	Advised by Health & Safety Manager that matters are now being discussed in directorate management meetings. However, Internal Audit could only confirm this for Corporate Resources and Social Care Directorates through meeting minutes.	Failure to hold frequent Health & Safety Board Meetings at directorate level undermines the governance framework and the drive towards improvements in the control of Health & Safety risks.	Health & Safety representative should attend directorate management meetings to ensure Health & Safety is discussed regularly to ensure that issues are being raised, discussed and actions can be communicated to staff.	Medium
Management Response		<p>Health and Safety is now a standard agenda item in all Directorate meetings, and the H&amp;S Team are invited to present at all Directorate meetings as of June 2025 as well as CLT on a monthly basis.</p> <p>All Executive Directors attend CLT so are aware of H&amp;S issues as through updates.</p> <p>H&amp;S have a meeting calendar which holds all directorate meetings and a chart of the information that should be reported at each meeting they attend.</p>	Responsible Individual		Craig Hill, Health & Safety Manager
			Date for Implementation		Implemented

# Annex 2: Objective, scope, and distribution

## Objective

The objectives of this review are to assess whether Slough Borough Council has in place adequate and appropriate policies, procedures, and controls in relation to accidents, incidents and near miss with a view to providing an opinion on the extent to which risks in this area are managed.

## Scope

The engagement will review the adequacy and effectiveness of the control framework put in place by management to mitigate the following risks:

**Roles and Responsibilities:** Staff are unaware of their roles and responsibilities in ensuring they comply with the Council's health and safety policy in respect of accident and incident reporting, investigation and monitoring.

**Policies and Procedures:** Policies and procedures not being adhered to leading to inappropriate health and safety measures within the workplace.

**Training:** The Council does not provide health and safety training in respect of accident reporting procedures to enable staff to discharge their responsibilities.

**Financial Risks:** Potential for fines, compensation claims, prosecution costs, and increased insurance premiums in the event of accidents and incidents.

**Monitoring:** Ineffective process for reporting and recording accidents, incidents and near misses and such events are not investigated to prevent similar events from occurring in the future.

**Management Reporting:** Poor governance arrangements in place for reviewing, scrutinising and managing health and safety accidents, incidents and near miss.

## Distribution

Pat Hayes, Executive Director - Property & Housing

Peter Hopkins, Director, Property and Assets

Peter Walsh, Head of Property Management

Craig Hill, Corporate Health, and Safety Manager

Shameem Din, Health & Safety Advisor

Chris Holme, Interim Finance Director, Financial & Commercial

Ian Kirby, Interim Head of Internal Audit

# Annex 3: Our classification systems

Substantial	<p><b>Substantial Assurance</b></p> <p>The framework of governance, risk management and control is adequate and effective.</p>
Reasonable	<p><b>Reasonable Assurance</b></p> <p>Some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management and control.</p>
Partial	<p><b>Partial Assurance</b></p> <p>There are significant weaknesses in the framework of governance, risk management and control such that it could be or could become inadequate and ineffective.</p>
Minimal	<p><b>Minimal Assurance</b></p> <p>There are fundamental weaknesses in the framework of governance, risk management and control such that it is inadequate and ineffective or is likely to fail.</p>

## Recommendation

Priority	Definition	Action required
High	Significant weakness in governance, risk management and control that if unresolved exposes the organisation to an unacceptable level of residual risk.	Remedial action must be taken urgently and within an agreed timescale.
Medium	Weakness in governance, risk management and control that if unresolved exposes the organisation to a high level of residual risk.	Remedial action should be taken at the earliest opportunity and within an agreed timescale.
Low	Scope for improvement in governance, risk management and control.	Remedial action should be prioritised and undertaken within an agreed timescale.

